



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James Scheibel, Treasurer
Democrats 2000
1311 L Street NW, Suite 300
Washington, DC 20005

Identification Number: C00230342

JUL 19 2000

Reference: April Quarterly Report (1/1/00-3/31/00)

Dear Mr. Scheibel:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule H2, you have checked the Exempt box for AO13 Admin. however, on Schedule H4, disbursements for AO13 Admin. are marked as Administrative/Voter Drive. For the public record, please clarify whether this event did in fact encompass more than one type of activity. If the activity or event should have been classified differently, please amend your report accordingly.

-Schedule H2 indicates the allocation ratio for "A028 Annual Dinner 2000" was revised during the reporting period. Please provide the date of the fundraising program or event. In the case of a telemarketing or direct mail campaign, the "date" is the last day of the telemarketing campaign, or the day on which the final direct mail solicitations are mailed. 11 CFR §106.5(f)(2) In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-Schedule H4 discloses a disbursement(s) for "AO27 Direct Mail: 6 App. '99" which is categorized as fundraising; however, Schedule H2 does not

include an allocation ratio for this activity. Please amend Schedule H2 to disclose the omitted ratio.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the total EVENT YEAR-TO-DATE amount for a payment(s) to SEIU. Please amend your report to include the missing EVENT YEAR-TO-DATE total(s).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to SEIU. Please amend your report to disclose the appropriate category.

-Schedule H3 of your report discloses the aggregate amount of in-kind corporate donations received for allocable activity. Pursuant to Advisory Opinion 1992-93, "In order to clarify when these transfers occurred, the committee should also note, on the Schedule H3 listing, that the transfer reflected thereon relates to H4 entries of donors that are itemized on specific pages, e.g., H4, p. 4, entries A and C." Please amend your Schedule H3 to properly disclose this missing information.

-Please amend your report by providing the address for each disbursement itemized on Schedule H4 supporting Line 21(a).

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "consulting". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time

period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Other federal operating expenditures should be properly disclosed on a separate Schedule B (if applicable), supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Andrea S. Wilkens
Senior Reports Analyst
Reports Analysis Division

